

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JOSE AVINA, on behalf of himself and	)	
a class,	)	
	)	
PLAINTIFF,	)	Case No. 21-cv-01993
	)	
v.	)	Hon. Franklin U. Valderrama
	)	
QUALIA COLLECTION SERVICES	)	
	)	
DEFENDANT.	)	

**Status Report**

**I. Progress of Discovery**

- A. Both parties have issued written discovery, but the parties have agreed to mutually extend response deadlines pending the Court's ruling on Plaintiff's motion to remand.
- B. Parties have not yet begun oral discovery. The parties anticipate beginning oral discovery after written discovery if the Court denies Plaintiff's motion to remand.

**II. Settlement Conference**

- A. The parties are not interested in a settlement conference at this time.

Dated: August 26, 2021

[signatures on following page]

Counsel for Plaintiff

s/ Daniel Brown

Daniel Brown  
Main Street Attorney, LLC  
PO Box 247  
Chicago, IL 60690  
P: (773) 453-7410  
E:[daniel@mainstreetattorney.com](mailto:daniel@mainstreetattorney.com)

Celetha Chatman  
Michael Wood  
Community Lawyers, LLC.  
980 N. Michigan Avenue, Suite 1400  
Chicago, IL 60611  
Ph: (312)757-1880  
Fx: (312)476-1362  
[cchatman@communitylawyersgroup.com](mailto:cchatman@communitylawyersgroup.com)  
[mwood@communitylawyersgroup.com](mailto:mwood@communitylawyersgroup.com)

Counsel for Defendant

s/ Brendan H. Little

Brendan H. Little  
Lippes Mathias Wexler Friedman LLP  
50 Fountain Plaza, Suite 1700  
Buffalo, NY 14202  
[blittle@lippes.com](mailto:blittle@lippes.com)  
Ph: (716) 853-5100  
[blittle@lippes.com](mailto:blittle@lippes.com)

**CERTIFICATE OF SERVICE**

I, Daniel Brown, an attorney, hereby certify that on August 26, 2021, I electronically filed the foregoing document using the CM/ECF system, which will send notification of such filing to all attorneys of record.

/s/ Daniel Brown  
Daniel Brown